

UNITED STATES DISTRICT COURT FOR  
DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

Plaintiff,

v.

2013 gray Porsche Panamera 4, Puerto Rico  
license plate number JZG-917, VIN  
WP0AA2A74DL010057

Defendant *In Rem*.

Civil No.:

**VERIFIED COMPLAINT FOR FORFEITURE IN REM**

TO THE HONORABLE COURT:

COMES NOW, the United States of America brings this Verified Complaint for Forfeiture *In Rem* under Supplemental Rule G(2) of the Federal Rules of Civil Procedure, Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, and 18 U.S.C. § 983, and alleges as follows:

**Nature of the Action**

1. This is a civil action *In Rem* under 21 U.S.C. § 881(a)(4).

**Jurisdiction and Venue**

2. This Court has subject matter jurisdiction over an action commenced by the United States pursuant to 28 U.S.C. § 1345; over an action for forfeiture pursuant to 28 U.S.C. § 1355; and over this particular action pursuant to 21 U.S.C. § 881(a)(4).

3. Venue is proper in this district and the Court has *In Rem* jurisdiction over the defendant vehicle pursuant to 28 U.S.C. § 1355(b)(1)(A) because the acts and omissions giving rise to the forfeiture occurred in this district.

**The Defendant *In Rem***

4. The Defendant *In Rem* is a 2013 gray Porsche Panamera 4, Puerto Rico license plate number JZG-917, VIN WP0AA2A74DL010057, seized from a residence occupied by Jonathan Martinez-Gonzalez, on March 22, 2023, at Vega Dorada neighborhood, #58, Vega Alta, Puerto Rico.
5. The Defendant *In Rem* is within the possession, custody, or control of the United States.

**Facts**

6. This Verified Complaint fully incorporates the facts contained in the attached Unsworn Declaration of Task Force Officer Miguel Perez-Ramos of the Federal Bureau of Investigations.

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**Claim for Relief**

The United States of America respectfully requests that the Court issue a warrant of arrest of the Defendant *In Rem*; that due notice be given to all parties to appear and show cause why the forfeiture should not be decreed; that the Court enter judgment declaring the Defendant *In Rem* condemned and forfeited to the United States of America for disposition according to law; and that the Court grant the United States of America such other and further relief as the Court may deem just and proper, together with the costs and disbursements of this action.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 12 day of September 2023.

W. STEPHEN MULDROW  
United States Attorney

/s/ Frank Norris  
Frank Norris  
Special Assistant United States Attorney  
USDC #301110  
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**VERIFIED DECLARATION**

I, Frank Norris, Special Assistant United States Attorney, declare pursuant penalty of perjury as provided by 28 U.S.C. § 1746, the following:

That the foregoing Complaint is based on reports and information furnished to me by the Federal Bureau of Investigations (FBI) that everything contained therein is true and correct

to the best of my knowledge and belief.

Executed in San Juan, Puerto Rico, this 12 day of September 2023.

/s/Frank Norris

Frank Norris

Special Assistant United States Attorney

**VERIFIED DECLARATION**

I, Miguel Perez, depose and say that I am a Task Force Officer of the Federal Bureau of Investigations (FBI) and as such have responsibility for the within action, that I have read the contents of the foregoing Verified Complaint for Forfeiture *In Rem* and, pursuant to 28 U.S.C. § 1746, verify under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed in San Juan, Puerto Rico, this 12 day of September 2023.



Miguel Perez-Ramos, Task Force Officer  
Federal Bureau of Investigation (FBI)